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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

SEARS HOLDINGS CORPORATION Et. Al.,

Debtors.

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Case No. 18-23538 (RDD)

**RESPONSE TO**  
**DEBTORS' EIGHTH**  
**OMNIBUS OBJECTION**  
**TO PROOFS OF CLAIMS**

**PLEASE TAKE NOTICE** that creditor Infiiloom India Private Limited (hereinafter “Infiiloom”) interpose the following response to the debtors’ eighth omnibus objection to proofs of claims (duplicate claims).

1. In the present case, Creditor Infiiloom had initially filed claim # 565 in the amount of \$91,307.16 against Kmart Corporation and claim # 664 in the amount of \$98,918.32 against Sears, Roebuck and Co.
2. Due to an administrative error Infiiloom filed a second set of claims under claim # 2924 in the amount of \$91,307.16 against Kmart Corporation and claim # 3181 in the amount of \$98,918.32 against Sears Roebuck and Co.
3. On or about September 9, 2019, before Infiiloom received a hard copy of the debtors’ eighth omnibus objection to proofs of claims (duplicate claims) Docket # 5101 (ECF filing date of September 9, 2019), it had noticed its administrative error as to the filing of duplicate claims and filed for the withdrawal of the duplicate claims. The withdrawal of claim # 2924 is attached hereto as EXHIBIT A. The withdrawal of claim # 3181 is attached hereto as EXHIBIT B.

4. Infiiloom received a hard copy of the debtors' eighth omnibus objection to proofs of claims (duplicate claims) Docket # 5101 and realized that the debtors were seeking to disallow claim # 565 and claim # 664 because of the duplicate claim # 2924 and claim # 3181.

5. Therefore, based on Infiiloom's withdrawal of claim # 2924 and claim # 3181, the debtors' eighth omnibus objection to proofs of claims (duplicate claims) Docket # 5101 with respect to Infiiloom claim # 565 and claim # 664 is moot and should be denied.

6. In the alternative if the Court is inclined to grant the debtors' eighth omnibus objection to proofs of claims (duplicate claims) Docket # 5101 with respect to respect to Infiiloom claim # 565 and claim # 664, then Infiiloom's withdrawal of claim # 2924 and claim # 3181 in Exhibit A and Exhibit B should be canceled and those claims should be allowed against the debtors.

**WHEREFORE,** this Court should deny the debtors' eighth omnibus objection to proofs of claims (duplicate claims) Docket # 5101 with respect to respect to Infiiloom claim # 565 and claim # 664.

Dated: New York, New York  
September 30, 2019

/s/ Vivek Suri  
Vivek Suri, Esq.

To: All Counsel of Record via ECF